THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

BOMBARDIER INC.,

Plaintiff,

v.

MITSUBISHI AIRCRAFT CORPORATION, MITSUBISHI AIRCRAFT CORPORATION AMERICA, INC., et al.,

Defendants.

2:18-cv-1543 RAJ

DECLARATION OF JERRY A.
RIEDINGER IN SUPPORT OF
DEFENDANTS MITSUBISHI AIRCRAFT
CORPORATION AMERICA, INC.'S
POSITION ON SCHEDULING MATTERS

Jerry A. Riedinger declares:

- 1. I am a partner in the law firm of Perkins Coie LLP and counsel for Defendant Mitsubishi Aircraft Corporation America, Inc. ("Mitsubishi Aircraft America") in this action. I am lead counsel for Mitsubishi Aircraft America in this case. I have personal knowledge of the matters herein.
- 2. I received today an email this afternoon from John Denkenberger, counsel for Bombardier Inc. ("Bombardier"). The email confirmed that Bombardier would narrow the injunction sought in Bombardier's Motion for a Preliminary Injunction, an issue that Bombardier has been considering for weeks. Bombardier has not yet served a copy of the narrower Proposed Order on the parties. A true and correct copy of the email is attached as Exhibit A. Perkins Coie LLP

DECLARATION OF JERRY A. RIEDINGER IN SUPPORT OF DEFENDANTS MITSUBISHI AIRCRAFT CORPORATION AMERICA, INC.'S POSITION ON SCHEDULING MATTERS (NO. 18-CV-1543 RAJ) – 1

Perkins Cole LLP 1201 Third Avenue, Suite 4900 Seattle, WA 98101-3099 Phone: 206.359.8000 Fax: 206.359.9000 3. The parties have negotiated an Interim Confidential Agreement that governs the production and distribution of the eleven documents that Bombardier relies on in support of its Motion for Preliminary Injunction. The eleven documents are identified by Bombardier as Exhibits A-J to the Burns declaration (Dkt. 5) and Exhibit A to the Tidd Declaration (Dkt. 7). Bombardier moved to file those eleven exhibits under seal (Dkt. 6, 8). That motion is pending (Dkt. 3). A true and correct copy of the Interim Confidentiality Agreement is attached as Exhibit B.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct

Executed this 7th day of December 2018.

<u>s/Jerry A. Riedinger</u> Jerry A. Riedinger

DECLARATION OF JERRY A. RIEDINGER IN SUPPORT OF DEFENDANTS MITSUBISHI AIRCRAFT CORPORATION AMERICA, INC'S POSITION ON SCHEDULING MATTERS (NO. 18-CV-1543 RAJ) – 2 142365039.3

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CERTIFICATE OF SERVICE

I certify under penalty of perjury that on December 7, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses indicated on the Court's Electronic Mail Notice List.

DATED this 7th day of December 2018.

s/Mary Z. Gaston

Mary Z. Gaston, WSBA No. 27258

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